

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

PRISCILLA STERLING, RAINE BECKER, AND
SHAWN MILLER, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

PLAINTIFFS

v.

CIVIL ACTION NO.: 3:22-cv-531-KHJ-MTP

THE CITY OF JACKSON, MISSISSIPPI;
CHOKWE A. LUMUMBA, JR.; TONY YARBER;
KISHIA POWELL; ROBERT MILLER; JERRIOT
SMASH; SIEMENS CORPORATION; SIEMENS
INDUSTRY, INC.; TRILOGY ENGINEERING
SERVICES, LLC; AND John Does 1-20,

DEFENDANTS

APPLICATION FOR ADMISSION PRO HAC VICE

(A) Name: Richard G. Daniels

Firm Name: Daniels, Rodriguez, Berkeley, Daniels & Cruz, P.A.

Office Address: 4000 Ponce de Leon Blvd., Suite 800

City: Coral Gables State: Florida Zip: 33146

Telephone: (305) 448-7988 Fax: _____

E-Mail: rdaniels@drbdc-law.com

(B) Client(s): Trilogy Engineering Services, LLC

Address: 650 N. Sam Houston Parkway E., Suite 300

City: Houston State: Texas Zip: 77060

Telephone: (305) 448-7988 Fax: _____

The following information is optional:

Have you had a prior or continuing representation in other matters of one or more of the clients you propose to represent, and is there a relationship between those other matter(s) and the proceeding for which you seek admission?

Yes, I currently represent Trilogy Engineering Services, LLC in the following matters:

J.W., a minor, v. City of Jackson et al.; P.R., a minor, v. City of Jackson et al.; and

C.A., a minor, v. City of Jackson et al.

Do you have any special experience, expertise, or other factor that you believe makes it particularly desirable that you be permitted to represent the client(s) you propose to represent in this case?

Yes, I have 44 years of experience in the defense of architects and engineers in their professional liability claims, including more than 40 jury trials to verdict in State and Federal Courts, including appeals in the Fifth Circuit Court of Appeals, the Eleventh Circuit Court of Appeals, and the Florida Third and Fourth District Courts of Appeals.

(C) I am admitted to practice in the:

 X State of Florida

 District of Columbia

and I am currently in good standing with that Court. A certificate to that effect, issued by the appropriate licensing authority within ninety days of the date of this Application, is enclosed; the physical address, telephone number and website/email address for that admitting Court are:

The Florida Bar
651 E. Jefferson Street
Tallahassee, Florida 32399
Ph: (850) 561-5600

All other courts before which I have been admitted to practice:

<u>Jurisdiction</u>	<u>Period of Admission</u>
<u>U.S. District Court, Southern District of Florida</u>	<u>1978</u>
<u>U.S. District Court, Southern District Trial Bar</u>	<u>1982</u>

U.S. District Court, Middle District of Florida2016U.S. Court of Appeals, Fifth Circuit1980U.S. Court of Appeals, Eleventh Circuit1982

(D) Have you been denied admission pro hac vice in this state? Yes No
() (X)

Have you had admission pro hac vice revoked in this state? () (X)

Has Applicant been formally disciplined or sanctioned by any court in this state in the last five years? () (X)

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations, the name of the person or authority bringing such proceedings; the dates the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings:

N/A

(E) Has any formal, written disciplinary proceeding ever been brought against you by a disciplinary authority in any other jurisdiction within the last five years? Yes No
() (X)

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations; the name of the person or authority bringing such proceedings; the date the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings.

N/A

Yes No

- (F) Have you been formally held in contempt or otherwise sanctioned by any court in a written order in the last five years for disobeying its rules or orders?

() (X)

If the answer was "yes," describe, as to each such order, the nature of the allegations, the name of the court before which such proceedings were conducted; the date of the contempt order or sanction, the caption of the proceedings, and the substances of the court's rulings (a copy of the written order or transcript of the oral rulings must be attached to the application).

N/A

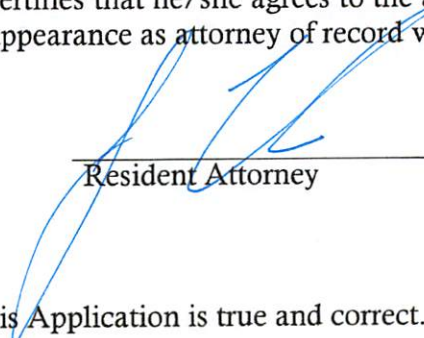
- (G) Please identify each proceeding in which you have filed an application to proceed pro hac vice in this state within the preceding two years, as follows:

<u>Name and Address of Court</u>	<u>Date of Application</u>	<u>Outcome of Application</u>
<i>U.S. District Court / Southern District</i>	<i>December 28, 2021</i>	<i>Granted</i>
<i>501 E. Court Street, Jackson, MS 39201</i>	<i>January 3, 2022</i>	<i>Granted</i>
	<i>June 13, 2022</i>	<i>Granted</i>

- (H) Please identify each case in which you have appeared as counsel pro hac vice in this state within the immediately preceding twelve months, are presently appearing as counsel pro hac vice, or have pending applications for admission to appear pro hac vice, as follows:

<u>Name and Address of Court</u>	<u>Style of Case</u>
<i>U.S. District Court / Southern District</i>	<i>J.W., a minor v. City of Jackson et al.</i>
<i>U.S. District Court / Southern District</i>	<i>P.R., a minor v. City of Jackson et al.</i>
<i>U.S. District Court / Southern District</i>	<i>C.A., a minor v. City of Jackson et al.</i>


- Yes No
- (I) Have you read and become familiar with all the
LOCAL UNIFORM CIVIL RULES OF THE UNITED STATES
DISTRICT COURTS FOR THE NORTHERN AND SOUTHERN
DISTRICTS OF MISSISSIPPI? (X) ()
- Have you read and become familiar with the MISSISSIPPI
RULES OF PROFESSIONAL CONDUCT? (X) ()
- (J) Please provide the following information about the resident attorney who has been
associated for this case:
- Name and Bar No.: D. Jason Childress / MS Bar No.: 103678
Office Address: 401 E. Capitol Street, 600 Heritage Building
City: Jackson State: Mississippi Zip: 39201
Telephone: (601) 968-5500 Fax: (601) 968-5593
E-Mail: djc@wisecarter.com
- (K) The undersigned resident attorney certifies that he/she agrees to the association with
Applicant in this matter and to the appearance as attorney of record with Applicant.



Resident Attorney

I certify that the information provided in this Application is true and correct.

9/27/2022
Date



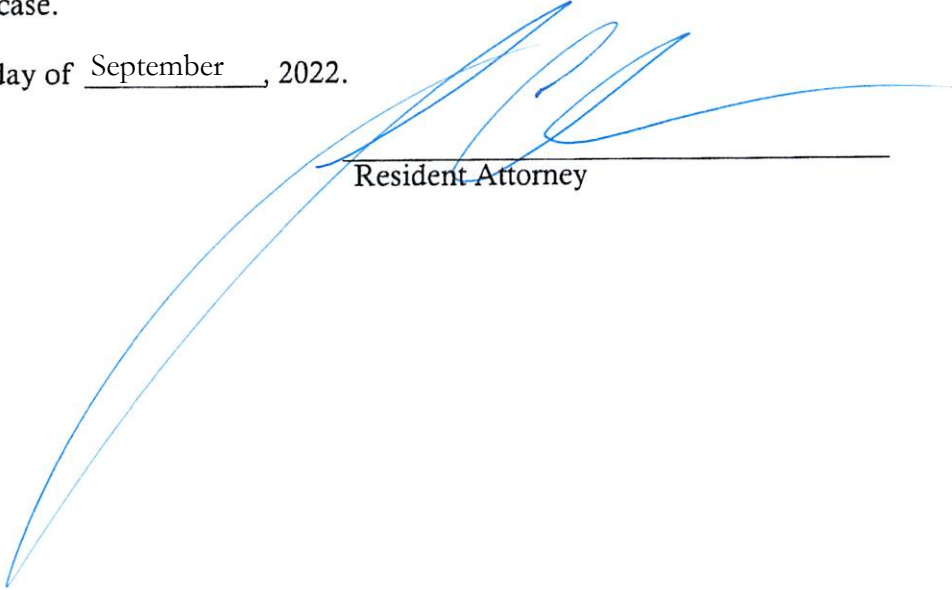
Applicant's Handwritten Signature

Unless exempted by Local Rule 83.1(d)(5), the application fee established by this Court must
be enclosed with this Application.

CERTIFICATE OF SERVICE

The undersigned Resident Attorney certifies that a copy of this Application for Admission Pro Hac Vice has been mailed or otherwise served on this date on all parties who have appeared in this case.

This the 27th day of September, 2022.



Resident Attorney